



*Practical Solutions  
in Groundwater Science*

221 N. Court Avenue, Suite 101  
Tucson, Arizona 85701  
520 622-3222 phone  
520 622-4040 fax  
www.clearcreekassociates.com

August 3, 2017

Ms. Nancy Rumrill  
Drinking Water Protection Section  
United States Environmental Protection Agency  
Region IX  
75 Hawthorne St.  
San Francisco, CA 94105-3901

Re: Revised Class III Underground Injection Control Permit Application  
Gunnison Copper Project, Cochise County, Arizona

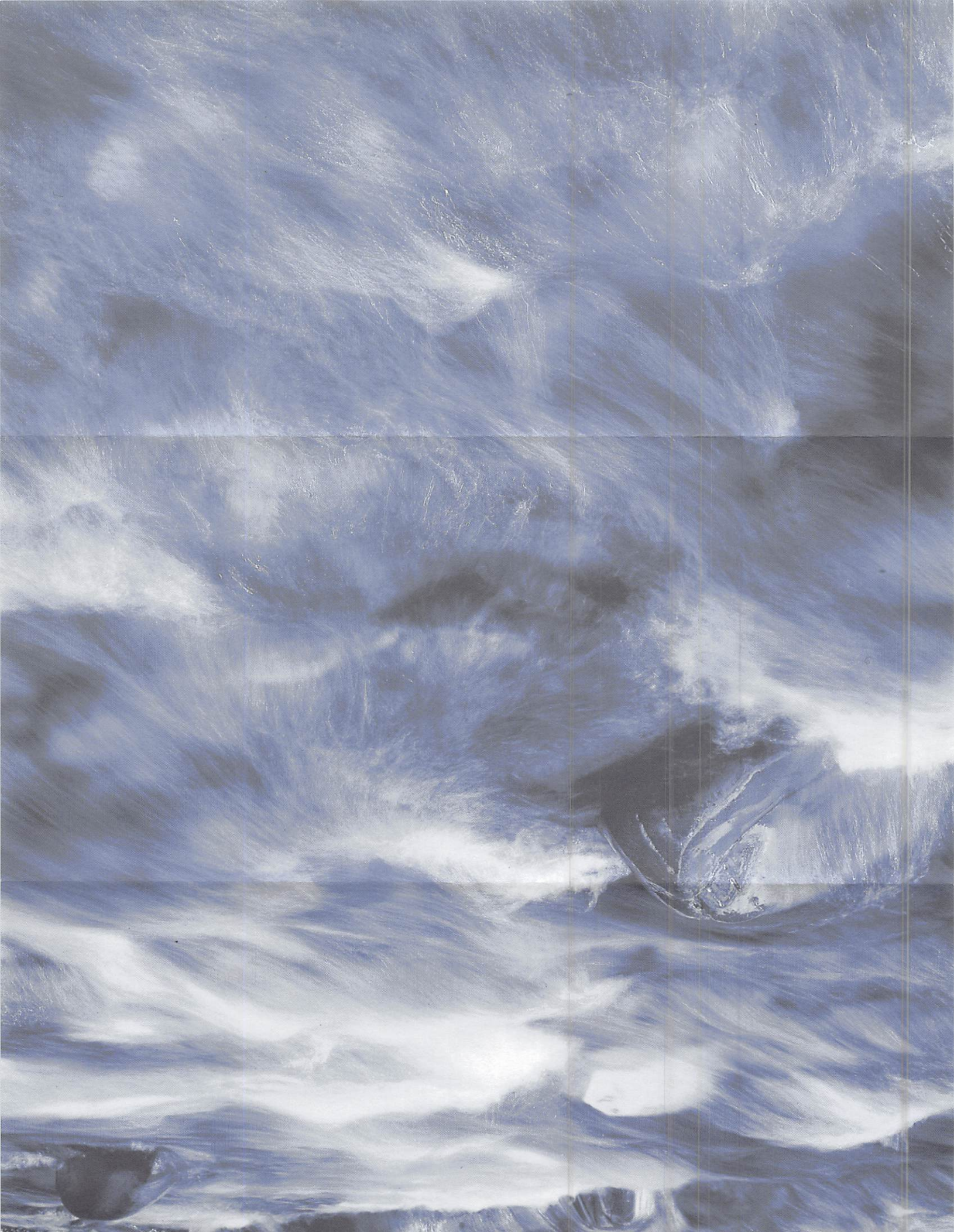
Dear Ms. Rumrill:

Please find enclosed revisions to Excelsior Mining's UIC Application, based on conversations we have had with you and your consultant, Jim Walker. Replacement hard copies are provided for those pages that were revised. Disc copies of the entire revised application are also provided. As you instructed, we also sent these revisions directly to Mr. Walker.

The following revisions were made:

- Attachment A-1, Sec 3.1.1: Revised language regarding the proposed aquifer exemption.
- Attachment A-1, Sec 3.2.7: Revised first sentence of second paragraph to read, "After construction of an injection/recovery, hydraulic control, observation well, or POC well is complete. . ."
- Attachment A-1 Section 3.2.7: 4<sup>th</sup> paragraph that starts with "Part 2 MI" was changed to refer to Attachment L, Section 3.2, not Attachment I.
- Attachment D, Figures D-3, D4 and D5: revised the pink shaded area that represents the USDW/Aquifer Exemption. The elevation of the top of the exemption was raised based on our conversations with you and Mr. Walker.
- Attachment N: Section 4.1.2: Revised the second to last paragraph in this section to reflect new aquifer exemption.
- Attachment P, Section 2.3.1: Revised first sentence of second paragraph to read, "After construction of an injection/recovery, hydraulic control, observation well, or POC well is complete. . ."
- Attachment P, Section 2.3.2: Revise second sentence in first paragraph to "As noted in Attachment L, Section 3.2, after construction of injection/recovery, hydraulic control, observation well, or POC well is complete. . ."
- Attachment R3: Added costs of post-closure monitoring for outer observation wells to Table R3-10 and Table R3-11. There were some minor revisions in the text to also reflect this change. POC well abandonment costs were not included in the closure costs because these will be bonded with ADEQ.









- Attachment S, Section 4 and 4.1: Revised to reflect revised aquifer exemption. Revised Figures S-6, S-7 and S-8 to be the same as Figures D-3, D-4 and D-5 (as described above). Also added Figure S-9 to show the elevation of the top of the proposed aquifer exemption.

Please feel free to call me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alison H. Jones", followed by a long horizontal line.

Alison H. Jones  
Sr. Hydrogeologist

Cc: Rebecca Sawyer  
Jim Walker